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April 2, 2025

Via ECF and E-mail

Hon. Cathy Seibel, U.S.D.J.
The Hon. Charles L. Brieant Jr.
Federal Building and United States Courthouse
300 Quarropas St.
White Plains, NY 10601-4150
chambersnysdseibel@nysd.uscourts.gov

Re: **Ben-Porath v. Vassar College**
Case No. 7:23-cv-08713-CS (S.D.N.Y.)

Dear Judge Seibel,

Our firm along with Lynch Carpenter, LLP represent Plaintiff Naomi Ben-Porath (“Plaintiff”) and the putative class in the above-referenced matter, and we write to advise Your Honor of the status of discovery disputes pursuant to the procedure for discovery disputes of the Civil Case Discovery Plan and Scheduling Order (“Scheduling Order”). (Dkt. No. 43).

Plaintiff received Vassar College’s (“Defendant”) initial production of documents on March 21, 2025, as ordered by the Court in the Scheduling Order. Upon review, Plaintiff noticed several deficiencies and reached out to Defendant to resolve the disputes. Following a meet and confer between both Parties counsels, Defendant has agreed to supplement their production by April 18, 2025, and produce documents relating to several of Plaintiff’s raised deficiencies. Based on the meet and confer and subsequent correspondence between counsel, Plaintiff expects the supplemental production will resolve the current disputes. However, to the extent that any further deficiencies exist that the Parties are not able to resolve Plaintiff will inform this Court within 14 days of the supplemental production.

To the extent that Your Honor requires anything further, Plaintiff is available to discuss.

Respectfully submitted,

/s/ Anthony M. Alesandro
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cc: All Counsel of Record via ECF.